



SENSITIVE

MEMORANDUM

November 23, 2009

TO:

The Commission

THROUGH: Alec Palmer

Acting Staff Director

FROM:

John D. Gibson

Chief Compliance Officer

Lynn M. Fraser Director, ADR Office

SUBJECT:

ADR 525 Vermont Democratic Party for the 2007-2008 Election Cycle

and Edward Clark, Treasurer, Informational Memo on Assignment

The Reports Analysis Division referred RAD 09L-43 for processing on November 16, 2009, and the ADR Office designated the referral ADR 525. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 525 on November 27, 2009. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: The Reports Analysis Division referred the Vermont Democratic Party for the 2007-2008 Election Cycle and Edward Clark, Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2008 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's errors included, among other things: mathematical discrepancies, failure to provide supporting schedules, and the allocation of Federal and Non-federal activity.